

SCHMIDT LAW FIRM

A PROFESSIONAL LIMITED LIABILITY COMPANY

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April 4, 2024

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Hon. Valerie E. Caproni
U.S. District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Cause No. 1:23-mc-00051-VEC; NLRB v. Schmidt, et al.; In the United States District Court for the Southern District of New York.

Dear Judge Caproni:

This letter is to request approval for me to post a cash deposit with the Clerk's office in lieu of a supersedeas bond to supersede the Judgment entered in this case against me for attorneys' fees, pending the appeal of this matter.

I have attached a proposed Order that:

- Authorizes the Clerk to hold a cash deposit of \$42,673.31 to secure the payment of the Judgment against Charles T. Schmidt in this case;
- Authorizes the Clerk to hold such funds until further order of this Court;
- Orders the NLRB to refrain from attempting to collect the judgment against Charles T. Schmidt until further order of this Court, or until 14 days after entry of the Order if a cash deposit is not made in the above amount prior to that time.

The 30-day stay of execution expires on April 5, 2024. Counsel for NLRB has agreed to refrain from collection efforts pending your approval of the Cash Deposit. Accordingly, I request expedited consideration of this matter.

The NLRB is unopposed to the entry of the attached Order.

Thank you for your service in this and other matters.

Respectfully Submitted,



Charles T. Schmidt

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cc: Amanda Leonard
David Boehm

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**NATIONAL LABOR RELATIONS
BOARD,**

Applicant,

V.

**CHARLES THOMAS SCHMIDT;
PARTY SHUTTLE TOURS, LLC;
CITY INFO EXPERTS, LLC;
UNIVERSAL SMART CONTRACTS, LLC;**

Respondents.

1:23 – mc – 51 (VEC)

ORDER AUTHORIZING POSTING OF CASH IN LIEU OF SUPERSEDEAS BOND

This Court entered Judgment against Charles Thomas Schmidt on or about March 5, 2024, awarding \$38,123.00 in attorneys' fees and \$321.42 in costs to the NLRB. 111% of that total amount is \$42,673.31. Mr. Schmidt wishes to post a cash deposit with the Clerk to secure payment of the Judgment against him personally, in lieu of a supersedeas bond. The Court finds that \$42,673.31 is a sufficient amount of collateral to secure payment of the Judgment against Mr. Schmidt.

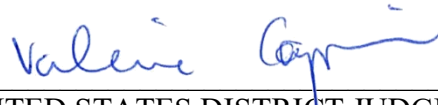
IT IS THEREFORE ORDERED that the Clerk is authorized to accept and hold a cash deposit from Mr. Schmidt in the amount of \$42,673.31 to supersede collection of the Judgment.

IT IS FURTHER ORDERED that the NLRB shall refrain from making attempts to collect the Judgment against Mr. Schmidt until further Order of this Court.

IT IS FURTHER ORDERED that, notwithstanding the above, in the event that a cash deposit in the above amount is not made by Mr. Schmidt within 14 days of the date of this Order, the NLRB is free to engage in collection efforts against Mr. Schmidt.

The Clerk of Court is respectfully directed to deposit the funds in an interest-bearing account pending further order of the Court.

Dated this 5 day of April, 2024.

A handwritten signature in blue ink, appearing to read "Valerie Capri", is written above a horizontal line.

UNITED STATES DISTRICT JUDGE